

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SHANNON STONE,

PLAINTIFF,

VS.

CASE NO. 21- CV-12736

HON. DENISE PAGE HOOD
M. ELIZABETH A. STAFFORD

ZETA GLOBAL CORP.,
A DELAWARE CORPORATION,

DEFENDANT.

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PLAINTIFF'S PRELIMINARY WITNESS LIST

Plaintiff, SHANNON STONE ("Plaintiff" or "Ms. Stone") hereby submits her preliminary list of witnesses to Defendant ZETA GLOBAL CORP. ("Defendant") in accordance with the Scheduling Order in this matter:

Witnesses: Pursuant to Fed. R. Civ. P. 26(a)(i), the list is comprised of each “individual likely to have discoverable information that [Plaintiff] may use to support [her] claims . . .” and any last known names, addresses and phone numbers.

1. Plaintiff Shannon Stone, contacted through counsel for Plaintiff
2. John Scully, current or former Zeta employee
3. David Steinberg, current or former Zeta employee
4. Steven Gerber, current or former Zeta employee
5. Eric Presbrey, current or former Zeta employee
6. Matt Martella, current or former Zeta employee
7. Jason Baadsgaard, current or former Zeta employee
8. Kevin McCarthy, current or former Zeta employee
9. Will Margiloff, current or former Zeta employee
10. Christian Monberg, current or former Zeta employee
11. Chris Greiner, current or former Zeta employee
12. David Schey, current or former Zeta employee
13. David Allen, current or former Zeta employee
14. Juliet Schuler, current or former Zeta employee
15. Pavan Korada, current or former Zeta employee
16. Harrison Davies, current or former Zeta employee

17. Jeremy Klein, current or former Zeta employee
18. Donald Steele, current or former Zeta employee
19. Sean Welsh, current or former Zeta employee
20. Tom Walsh, current or former Zeta employee
21. Denise Lang, current or former Zeta employee
22. Steve Vine, current or former Zeta employee
23. Jeffrey Bernall, current or former Zeta employee
24. Giuliva Avanzato, current or former Zeta employee
25. Candice Osnato, current or former Zeta employee
26. Chad Miller, current or former Zeta employee
27. Nick Tarant, current or former Zeta employee
28. Matthew Walters, current or former Zeta employee
29. Lewis Steckler, current or former Zeta employee
30. Cameron Roegner or Roegen, current or former Zeta employee
31. Eric Caraboolad, current or former Zeta employee
32. Caitlin Mooney, current or former Zeta employe
33. Jenni Stoddard, current or former Zeta employee
34. Kelsey O'Donnell, current or former Zeta employee
35. Melissa Racklin, current or former Zeta employee

36. Marie Aiello, current or former Zeta employee
37. Savitha Nanuduri, current or former Zeta employee
38. Sandra Santilli, current or former Zeta employee
39. Amy Jones, current or former Zeta employee
40. Kayla Dole, current or former Zeta employee
41. Crystal Eastman, current or former Zeta employee
42. Megan Rose, current or former Zeta employee
43. Suzanne Darmory, current or former Zeta employee
44. Jeff Mott, current or former Zeta employee
45. Chris Spring, current or former Zeta employee
46. Narendra Amarineni, current or former Zeta employee
47. Dex Bindra, current or former Zeta employee
48. Eric Zaner, current or former Zeta employee
49. Rick Winnard, current or former Zeta employee
50. Mary Schlafly, current or former Zeta employee
51. Jeff Stern, current or former Zeta employee
52. Marc Feledy, current or former Zeta employee
53. Loveen Advani, current or former Zeta employee
54. Michael Lewis, current or former Zeta employee

55. Kristen Hessler, current or former Zeta employee
56. Narender Odela, current or former Zeta employee
57. Ken Levarek, current or former Zeta employee
58. Lauren Leitman, current or former Zeta employee
59. Neej Gore, current or former Zeta employee
60. Molissa Silver, current or former Zeta employee
61. Cullen Jowitt, current or former Zeta employee
62. David Bonaille, current or former Zeta employee
63. Ian Whitney, current or former Zeta employee
64. Melissa Madtson, current or former Zeta employee
65. Mohammed Amer, current or former Zeta employee
66. David McPhillips, current or former Zeta employee
67. Custodians of records for Zeta Global Corp and Zeta ZX
68. Custodians of records for Matt Martella's former employers
69. Custodians of records for Jason Baadsgaard's former employers
70. Custodians of records Progressive, DISH, Sprint, Verizon, ADT, Esurance, GerberLife, NAM, AHS, Chase, Charter, AmEx, T-Mobile, Citi, GLIC, BJ's, 1800 Contacts, Quip, BlueApron, Barclay, USAA, Axxess, Homelight, Sling. Allstate, Consumer Cellular, Experian, ADS, Travelers

71. Data Analytics Expert
72. Marketing Expert
73. Economic expert
74. Human Resources Best Practices Expert
75. Behavioral health expert
76. Witnesses identified during discovery
77. Witnesses identified by Defendant
78. Rebuttal witnesses
79. Witnesses needed to authenticate documents

Plaintiff reserves the right to amend this witness list and to add or delete witnesses identified on this list in accordance with the Scheduling Order in this matter, based on what is disclosed during discovery, and as otherwise appropriate up to and throughout any trial in this matter.

Respectfully submitted,

GASIOREK MORGAN,

/s/Raymond J. Carey

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Dated: April 25, 2022

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the attached document was served on April 25, 2022, upon all parties and/or attorneys of record in this matter at their respective email addresses as disclosed by pleadings in this matter.

/s/ Randi Hanlon